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**From:** Osborne, Russell [Russell.Osborne@dnr.mo.gov]  
**Sent:** 1/27/2020 3:16:03 PM  
**To:** Hanlon, Lisa [Hanlon.Lisa@epa.gov]  
**Subject:** RE: Tire Pyrolysis Determination

Hi Lisa,

Thank you for the response. I will contact the installation and attempt to obtain a detailed process flow diagram with the model of the pyrolysis unit to be included. I will reach out to you as soon as I receive the full information from the installation.

Thank you,

Russell Osborne

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**From:** Hanlon, Lisa <Hanlon.Lisa@epa.gov>  
**Sent:** Monday, January 27, 2020 7:53 AM  
**To:** Osborne, Russell <Russell.Osborne@dnr.mo.gov>  
**Subject:** FW: Tire Pyrolysis Determination

Hi Russell:

This is the response I received from EPA headquarters regarding your tire pyrolysis question.  
Lisa Hanlon

Lisa Hanlon  
Air Compliance  
U.S. EPA Region 7  
11201 Renner Blvd.  
Lenexa, KS 66219  
913-551-7599  
[hanlon.lisa@epa.gov](mailto:hanlon.lisa@epa.gov)

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**From:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>  
**Sent:** Monday, January 27, 2020 7:11 AM  
**To:** Modak, Nabanita <[Modak.Nabanita@epa.gov](mailto:Modak.Nabanita@epa.gov)>; Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>  
**Subject:** RE: Tire Pyrolysis Determination

I don't have anything to add. I agree more information to ensure that no combustion is occurring would be necessary. Thanks.

Sara Ayres  
Air Branch  
USEPA / OECA / OC / MAMPD  
[ayres.sara@epa.gov](mailto:ayres.sara@epa.gov)  
(312) 353-6266

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**From:** Modak, Nabanita <[Modak.Nabanita@epa.gov](mailto:Modak.Nabanita@epa.gov)>  
**Sent:** Friday, January 24, 2020 5:27 PM  
**To:** Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>  
**Cc:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>  
**Subject:** RE: Tire Pyrolysis Determination

Hi Lisa,

From the look of it ( with very limited information provided to EPA), it does not look like a CISWI unit. We do need to confirm that the process is pyrolysis. We would like to get a detailed process description with a process flow diagram. If the process is proven to be a pyrolysis process ( which is not combustion) and with the excess syngas getting routed to the RTO ( which will trigger contained gas argument under CISWI and be exempt), then the unit will not be subject to CCCC and DDDD. I have copied Sara ( from OECA) if she wants to add anything. As I said we need more information to analyze the process is truly non-combustion.

Thanks  
Nabanita

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**From:** Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>  
**Sent:** Thursday, January 23, 2020 10:41 AM  
**To:** Modak, Nabanita <[Modak.Nabanita@epa.gov](mailto:Modak.Nabanita@epa.gov)>  
**Subject:** FW: Tire Pyrolysis Determination

Hi Nabanita:

I haven't looked at CISWI in a while and could use a little technical help. Would the tire pyrolysis unit described below in the blue section be subject to CISWI?

Thanks for your help...

Lisa

Lisa Hanlon  
Air Compliance  
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11201 Renner Blvd.  
Lenexa, KS 66219  
913-551-7599  
[hanlon.lisa@epa.gov](mailto:hanlon.lisa@epa.gov)

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**From:** Osborne, Russell <[Russell.Osborne@dnr.mo.gov](mailto:Russell.Osborne@dnr.mo.gov)>  
**Sent:** Thursday, January 23, 2020 9:03 AM  
**To:** Hanlon, Lisa <[Hanlon.Lisa@epa.gov](mailto:Hanlon.Lisa@epa.gov)>  
**Subject:** Tire Pyrolysis Determination

Good morning Ms. Hanlon,

My name is Russell Osborne I work for the Missouri Department of Natural Resources – Air Permitting Section. I currently have an application for the pyrolysis of tires. I have looked through old emails and comments about the subject but remain unsure of the determination.

In an old email conversation (January 4, 2017) with an former MoDNR employee I found the following response from you: “ It sounds to me like the tire pyrolysis unit is not an incinerator. According to the NHSM rule, if a material is processed before burning, then it is not considered a waste. The “processing” is what turns a waste into a fuel, and

apparently shredding tires (regardless of whether it's done on site or somewhere else) is considered to be "processing" the material into a fuel. Therefore, this pyrolysis unit couldn't be an incinerator because the CAA defines an incinerator as something that burns *any solid waste*."

The current proposed process I am working on does not process the tires. The company loads whole used tires into the pyrolysis reactor. Collected vapor is condensed to synoil. Non-condensable vapor (syngas) is indirectly fired to heat the chamber. Excess syngas is directed through an RTO onsite. Syngas is not sold offsite. Does this make the process a solid waste incinerator and applicable to CISWI?

If there is more information needed to help please do not hesitate to let me know!

Thank you,

**Russell Osborne, E.I.T.**

Missouri Department of Natural Resources

Air Pollution Control Program

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